

## GIFT ENTERTAINMENT & HOSPITALITY POLICY (“GIFT POLICY”)



### 1. The Purpose

MKA Group (“the Group”) is committed to conducting business with the highest standards of ethics, transparency, and integrity. This policy is aimed at preventing conflicts of interest and the perception of impropriety that may arise from the giving or receiving of gifts , entertainment or hospitality in connection with the Group’s business operations.

### 2. Application of Policy

This Policy shall apply to all employees, Directors and officers of the Group and all third parties associated with the Group which shall include suppliers, vendors, contractors, subcontractors, customers, agents and consultants. This Code shall be applicable to the Group’s operations in Malaysia and in all countries where the Group has established business presence.

### 3. This Policy

The Group adopts a strict compliance of this “ **Gift Policy**”. Employees and representatives of the Group are prohibited from soliciting, accepting, or offering any gifts, entertainment, hospitality, or other benefits from or to any third party in relation to the Group’s business dealings.

This prohibition shall cover (but is not limited to) the following non-exhaustive instances with face value in excess of **RM500.00** or equivalent to **USD125.00** per gift or instance and more than **ONE (1) TIME** from the same party within any full calendar year:

- a. Gifts of cash or cash equivalents (red packet, cash vouchers, gift cards, discounts or Rebates not available to the general public) or ;
- b. Festive hampers, souvenirs and any form of gifts;
- c. Paid entertainment, leisure activities, services, travels packages, and accommodations;
- d. Friendly loans or any favours to do or refrain from doing any action; and
- e. Where the value of the gift/entertainment/hospitality cannot be ascertained or received in excess of one (1) time from the same gifting party.

(Hereafter shall be collectively referred to as “**Prohibited Gifts**”)

The objective of this Policy is to ensure that all business decisions are made fairly, objectively, and solely in the best interest of the Company.

#### 4. Exceptions

The following limited exceptions may apply where it would be considered discourteous or impractical to refuse:

- a. Token gifts, door gifts or souvenir of nominal value (below RM100) given at public events, seminars and/or celebratory or cultural events;
- b. Promotional or corporate gifts with corporate logo of the host organizer;
- c. Meals or refreshments provided by the host during business meetings that are reasonable and incidental to the meeting;
- d. Gifting within the Group and as between employees of the Group in line with the multi-cultural celebrations celebrated in Malaysia ;
- e. Gifts of perishable items such as food, fruits and flowers ; and
- f. Any Gifts/Entertainment/Hospitality not falling within the definition of “**Prohibited Gifts**”.

(Hereafter shall be collectively referred to as “**Exempted Gifts**”)

#### 5. Prohibited Circumstances

Employees are **PROHIBITED** from accepting or offering gifts, entertainment, or other benefits from any party involved in the following circumstances:

- a. During tendering, call for quotation or vendor/distributor evaluation processes;
- b. When dealing with officers from governmental, regulatory, statutory or enforcement authorities ;
- c. When it may give rise to influence or appearance of influencing any business decisions with regards to procurement, appointments or joint ventures;
- d. From third parties nominees acting on behalf of parties having business relationship with the Group.

#### 6. Formation of Integrity Committee

To ensure compliance and continuous review of the effectiveness of this Policy, the Integrity Committee (“the Committee”) shall be set up and shall consist of the Group Chief Executive Officer, the Group Chief Financial Officer, Head of Human Resource and Head of Legal and Compliance.

The Integrity Committee shall be chaired by the Chief Executive Officer and shall meet and deliberate on matters involving gift declaration or reporting, dealing with Prohibited Gifts, Policy review and any matter incidental to this Policy as and when deemed fit. The members of the Committee shall decide and agree on matters pertaining to it’s internal governance and procedures from time to time at their absolute discretion. The Committee shall establish and maintain a Gift Register for the purposes of operating this Policy.

The Committee shall decide on dealing with Prohibited Gifts wherein the Committee may decide as follows :-

- a. Recipient shall be allowed to retain the gift ; or
- b. The gift shall be donated to charity or shared with staff or as may otherwise be directed by the Committee; or
- c. In the case of hospitality, entertainment or benefits received, the Committee may recommend appropriate advisory or warning to the employee recipient to be more mindful of the prohibitions under the Policy moving forward.

The decision of the Committee shall be conveyed to the recipient and the decision shall be deemed final.

## **6. Declaration and Reporting**

For instances of **Exempted Gift**, the recipient shall fill out the Gift Declaration Form (“Gift Form”) and submit online to ([gifts@mkagr.com](mailto:gifts@mkagr.com)) within two (2) working days from date of receipt. Thereafter, NO further action is required.

Whereas in dealing with **Prohibited Gift** and in all other circumstances such as where the value of the gift or entertainment/hospitality/benefit is cannot be accurately ascertained or where the gifting or entertainment/hospitality/benefit exceeds the value or frequency threshold, the following steps shall be taken:-

- a. The gift or entertainment/hospitality/benefit must be declared by filling the Gift Declaration Form (“Gift Form”);
- b. The recipient must then submit the Gift Form online to ([gifts@mkagr.com](mailto:gifts@mkagr.com)) within two (2) working days from the date of receiving the gift/entertainment/hospitality/benefit;
- c. Upon receipt of the Gift Form, the Integrity Committee shall decide on how to deal with the gift/entertainment/hospitality/benefit and the Committee’s decision shall be conveyed to the recipient.

## **7. Non-Compliance**

Non-compliance or breach of this Policy by Employees of the Group shall result in disciplinary action, which may include:

- a. Issuance of formal warning at first instance or suspension for repeated non-compliance;
- b. Termination of employment in serious cases; and
- c. Where deemed appropriate, lodging reports to enforcement agencies such as the police and Malaysian Anti-Corruption Commission.

In the case of non-compliance or breach of this Policy by business associates or consultants/service providers, the Group shall be entitled to termination of business relationship/appointment/award.

## **8. Roles and Responsibilities**

Employees must read, understand, and comply with this Policy at all times. Heads of Department and Managers should ensure that respective team members are aware of and adhere to the Policy and to be communicate to all stakeholders and business associates of the Group. The Integrity Committee shall maintain the Gift Register, reviews declarations, and advises on compliance from time to time.

Employees and stakeholders are encouraged play their part in raising any genuine concerns of non-compliance to this Policy by whistleblowing via email to [whistleblow@mkagr.com](mailto:whistleblow@mkagr.com) or other such prescribed channels as found in the Group Whistleblowing Policy at our website [www.mkagr.com](http://www.mkagr.com).

## **9. Policy Review**

This Policy shall be reviewed at least once every two (2) years or due to any change in business circumstances. All updates shall be communicated to all employees and relevant stakeholders.

Effective Date: **30 January 2026**